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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTVPAD LTD. COMPANY d/b/a
 NEWTVPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 MMM (AJWx)

**STIPULATION FOR ENTRY OF
 [PROPOSED] CONSENT
 JUDGMENT AND PERMANENT
 INJUNCTION**

[Proposed Consent Judgment and
 Permanent Injunction concurrently
 submitted]

Courtroom: 780

Judge: Hon. Margaret M. Morrow

Action Filed: March 13, 2015

This Stipulation is entered by and between Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH Network L.L.C. (collectively, “Plaintiffs”) and Defendants newTVpad Ltd. Company d/b/a newtvpad.com a/k/a TVpad USA and Liangzhong Zhou (collectively, the “newTVpad Defendants”), through their respective counsel of record, with reference to the following facts:

1. Plaintiffs filed the Complaint in this action on March 13, 2015, against, among others, the newTVpad Defendants, with claims including: (1) secondary copyright infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*; (2) federal trademark infringement and unfair competition under the Lanham Act, 15 U.S.C. § 1125(a); (3) common law trademark infringement and unfair competition; and (4) violation of California Business and Professions Code § 17200, *et seq.*

2. Plaintiffs and the newTVpad Defendants have agreed to resolve their dispute, and have entered into a Settlement Agreement wherein the newTVpad Defendants have agreed to entry of a consent judgment and permanent injunctive relief in favor of Plaintiffs and in accordance with other terms as set forth in the Settlement Agreement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

1. A true and correct copy of the Consent Judgment and Permanent Injunction agreed to by the parties pursuant to this Stipulation and the parties’ Settlement Agreement (the “Consent Judgment”) is attached hereto as **Exhibit 1**;

2. The parties agree that all facts set forth in the Consent Judgment are true and accurate to their best knowledge and support entry of the Consent Judgment;

3. The newTVpad Defendants agree to be bound by and abide by all permanent injunctive relief set forth in the Consent Judgment entered by the Court;

4. The parties hereby enter into this Stipulation with the advice of counsel knowing its content and effect;

